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Attorney for Defendant ANTHONY TURNER

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

| | | |
|--------------------------|---|------------------------------------|
| UNITED STATES OF AMERICA |) | No. CR-15-266-HSG |
| |) | |
| Plaintiff, |) | STIPULATION AND |
| |) | [PROPOSED] ORDER |
| v. |) | MODIFYING CONDITIONS |
| |) | OF RELEASE |
| ANTHONY TURNER, |) | |
| |) | |
| Defendant. |) | |
| |) | |

Defendant Anthony Turner was indicted on August 11, 2016 on charges of conspiracy to enter an airport in violation of security requirements in violation of 18 U.S.C. § 371 and entering an airport in violation of security requirements, in violation of 49 U.S.C. §§ 46314, subdivisions (a) and (b)(2).

Mr. Turner appeared before this court on August 15, 2016, at which time, this Court ordered Mr. Turner released on an unsecured bond in the amount of \$25,000. Since that time, Mr. Turner has fully complied with the conditions of his release.

Among Mr. Turner's conditions of release is the standard condition that he not travel outside the Northern District without the Court's prior approval. Mr. Turner

1 currently resides in the Northern District. However, for financial reasons, he must relocate
2 and has secured housing in Sacramento, in the Eastern District of California. Mr. Turner is
3 currently employed with a catering company, which caters events around the Bay Area,
4 but is based in Sacramento.
5

6 Counsel for Mr. Turner has conferred with U.S. Pretrial Services Officer Timothy
7 Elder, who expressed that the Pretrial Services Office is not opposed to the proposed
8 modification.
9

10 For the foregoing reasons, the parties agree that Mr. Turner may reside in
11 Sacramento, in the Eastern District of California and may travel in the Eastern and
12 Northern Districts.
13

14 IT IS SO STIPULATED.
15

16 Date: 3/21/17

/s/ Suzanne M. Morris

17 _____
18 Suzanne M. Morris
19 Counsel for Anthony Turner


20
21 Dated: 3/21/17

/s/ Garth Hire

22 _____
23 Garth Hire
24 Assistant United States Attorney

25 IT IS SO ORDERED.

26 Date: 3/22/17

27 
28 The Honorable Kandis A. Westmore
United States Magistrate Judge